

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

BEDFORD, FREEMAN & WORTH PUBLISHING  
GROUP, LLC d/b/a MACMILLAN LEARNING,  
CENGAGE LEARNING, INC., ELSEVIER INC.,  
MCGRAW-HILL GLOBAL EDUCATION  
HOLDINGS, LLC, and PEARSON EDUCATION,  
INC.,

Plaintiffs,

v.

TRUNG KIEN NGUYEN, DUY ANH NGUYEN,  
DUONG THI BAY, XUAN CHINH NGUYEN,  
TUAN ANH NGUYEN, VINH NGOC NGUYEN,  
LE TRANG, VAN QUYNH PHAM, THI LIEN  
PHUONG NGUYEN, VAN TUAN DANG, HIEN  
VO VAN, QUANG NGUYEN, VU NGUYEN  
KHANG, GINGER BOTTORFF, SHERRY  
FLOYD, JESSICA GOLDBERG, MAXIM  
GUBCEAC, KELLI LANE, TRACEY LUM,  
RODNEY MOUZONE, ZAINEE JALLAL, BIN LI,  
PAN PAN CAO, MICHAEL MCEVILLE, ION  
SOBOL, ANTHONY TORRESI, HASEEB  
ANJUM, WALESKA CAMACHO, ANJUM  
AKHTER, SUSAN RAGON, ALIFF SYUKRI  
HAMDAN, KIM HAI LONG, KHUYEN  
NGUYEN, ERIKA DEMETEROVA, ROSTISLAV  
ZHURAVSKIY, STEFAN DEMETER, SHAHBAZ  
HAIDER, VALENTINA RODRIGUEZ, and  
CHANTELLE MELENDEZ,

Defendants.

**Civil Action No. 19-cv-10524-LAK**

**PLAINTIFFS' MOTION TO AMEND COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 15(a), Plaintiffs Bedford, Freeman & Worth  
Publishing Group, LLC d/b/a Macmillan Learning, Cengage Learning, Inc., Elsevier Inc., McGraw

Hill LLC,<sup>1</sup> and Pearson Education, Inc. (collectively, “Plaintiffs”), by and through their undersigned counsel, hereby respectfully move the Court for leave to amend the Complaint. A proposed First Amended Complaint is attached hereto as Exhibit 1. The proposed First Amended Complaint identifies the true names of Defendants named as “Does” in the original Complaint and supplements and clarifies certain factual allegations based on information that has been obtained in discovery thus far. Pursuant to the applicable legal standard for motions to amend, as discussed in the accompanying memorandum of law, good cause exists to amend the Complaint.

Dated: May 21, 2020

Respectfully submitted,

By: /s/ Matthew I. Fleischman

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<sup>1</sup> On January 1, 2020, McGraw Hill LLC became the successor in interest to McGraw-Hill Global Education Holdings, LLC.